

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

American
Chemistry
Council

Good Chemistry
For a Better World

July 11, 2003

Via US Mail and e-mail

Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
4-methylphenol, reaction products with dicyclopentadiene and isobutylene
(CAS number 68610-51-5)**

Dear Administrator:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for CAS number 68610-51-5, and constitutes a partial revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 18, 2001, CAS number 68610-51-5 was included in a category called "Hindered Phenols." In comments dated December 5, 2002, EPA noted that "the data provided by the sponsor support the category with respect to the physicochemical, environmental fate and ecotoxicological properties of these substances; the health endpoints are less well supported." Comments received from Environmental Defense (dated May 23, 2002) also raised questions about the "Hindered Phenols" category. Accordingly, in response to the comments, revised Test Plans and Robust Summaries for the eight chemicals that comprised the former "Hindered Phenols" category will be submitted as two categories (Styrenated Phenols and Bridged Alkyl Phenols) and two stand-alone chemicals (CAS numbers 68610-51-5 and 27676-62-6).

This submission also is being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov



Responsible Care®

Administrator
RAPA-HPV
July 11, 2003
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If you require additional information, please contact the RAPA Panel's technical contact,
Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments